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*Counsel for Defendant Facebook, Inc.*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE FACEBOOK BIOMETRIC  
INFORMATION PRIVACY LITIGATION

THIS DOCUMENT RELATES TO:  
  
ALL ACTIONS

\_\_\_\_\_  
FREDERICK WILLIAM GULLEN, on behalf  
of himself and all others similarly situated,

Plaintiff,

v.

FACEBOOK, INC.,

Defendant.

Master Docket No.: 3:15-CV-03747-JD

**DECLARATION OF JOHN  
NADOLENCO**

Hon. James Donato

Date: November 2, 2017  
Time: 10:00 a.m.  
Location: Courtroom 11

Case No. 3:16-cv-00937-JD

1 I, John Nadolenco, hereby declare as follows:

2 1. I am an attorney licensed to practice before the courts of the State of California  
3 and this Court. I am a partner with the law firm of Mayer Brown LLP, counsel for defendant  
4 Facebook, Inc. ("Facebook") in the above-captioned matter.

5 2. I make this Declaration on my own personal knowledge, except where stated on  
6 information and belief, and if called upon as a witness to do so, I could and would competently  
7 testify as to the matters set forth herein.

8 3. A true and correct copy of Facebook's Statement of Rights and Responsibilities is  
9 attached as Exhibit A to Facebook's Motion to Dismiss.

10 4. A true and correct copy of Facebook's Data Policy is attached as Exhibit B to  
11 Facebook's Motion to Dismiss.

12 I declare under penalty of perjury under the laws of the State of California and the United  
13 States that the foregoing is true and correct.

14 Executed this 28th day of September, 2017, in Los Angeles California.

15 /s/ John Nadolenco

16 John Nadolenco  
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